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WRITER'S DIRECT NUMBER  
(202) 861-3914

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Ms. Donna Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: MM Docket No. 87-268/ATV

Dear Ms. Searcy:

On behalf of Puerto Rico Public Broadcasting Corporation ("PRPBC"), licensee of noncommercial stations WIPR-TV, WIPR-FM, WIPR(AM), and WIPM-TV, all in Puerto Rico, we hereby transmit the original and four copies of PRPBC's comments regrading the implementation of ATV in Puerto Rico in connection with the above-referenced proceeding.

Please do not hesitate to call us if you have any questions.

Very truly yours,

*Nora E. Garrote*  
Nora E. Garrote

cc: Eduardo Rivero Albino  
Donald Everist

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**Puerto Rico  
Public Broadcasting Corporation**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Ms. Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M. Street, NW  
Washington, DC 20554**

**RE: MM Docket No. 87-268  
Comments by Puerto Rico Public  
Broadcasting Corporation**

**Dear Ms. Searcy:**

**The following comments are provided by the Puerto Rico Public Broadcasting Corporation ("PRPBC"), licensee of non-commercial Television Stations WIPR-TV and WIPM-TV (both VHF stations); FM Station WIPR-FM and AM Station WIPR. PRPBC is concerned with the complications and difficulties to providing adequate ATV television signals posed by mountainous Puerto Rico terrain. PRPBC believes that to mandate that stations such as WIPR-TV and WIPM-TV operate ATV facilities within the contemplated time is not realistic for Puerto Rico<sup>1</sup>. Further, PRPBC believes the ATV record in this docket to date does not support that duplicate ATV service compared to the present NTSC service can be achieved. This suggests that after the transition period, less educational service will result. In addition, Appendix B in MM Docket 87-268 suggests that extraordinary means will be required to receive ATV. PRPBC believes that to burden its citizens to use extraordinary means when they do not have the economic base to support the cost of special receivers and special receiving antennas for the implementation of ATV will reduce the effectiveness of its efforts to bring educational service to Puerto Rico.**

**<sup>1</sup>There are many stations in Puerto Rico that are operating under difficult economic conditions, particularly UHF stations which experience problems in achieving wide area NTSC coverage.**

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*PRPBC believes that the problems posed by assigning UHF channels for use for ATV in Puerto Rico<sup>2</sup> will make it difficult, if not impossible, to achieve island wide educational ATV service. Furthermore, Puerto Rico presents a unique allocation situation and propagation environment with its rugged terrain separating the island with low lying coastal regions and therefore warrants special attention and consideration. PRPBC television stations now experience difficulty in providing ideal service even on VHF frequencies. PRPBC believes that UHF propagation will not be conducive to long-term operations for advanced television in Puerto Rico. At the minimum, PRPBC believes reversion to the VHF channels at the conclusion of the NTSC period is not only an imperative, but it is a necessity.*

*On numerous occasions, the Federal Communications Commission has recognized Puerto Rico's unique requirements in various broadcast allocation matters. PRPBC urges that the Federal Communications Commission address these very important concerns and at the minimum extend the ATV implementation time and provide a reversion from UHF to VHF at the appropriate time. This is particularly vital to Puerto Rico's long-term educational needs and desires.*

*Please do not hesitate to contact us if you need additional information on these issues.*

Very truly yours,



Eduardo Rivero Albino  
Executive Director

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<sup>2</sup>Second Further Notice of Proposed Rule making, released August 14, 1992, Appendix D.